

Message

From: Parent, Stephanie@ARB [stephanie.parent@arb.ca.gov]
Sent: 10/8/2019 7:33:30 PM
To: Danny McQuillan [danny@vcapcd.org]; Fideldy, Ariel@ARB [ariel.fideldy@arb.ca.gov]; Sutkus, Carol@ARB [carol.sutkus@arb.ca.gov]; Lo, Doris [Lo.Doris@epa.gov]
CC: Ali Ghasemi [aghasemi@vcapcd.org]
Subject: RE: Ventura County APCD Updates to Proposed Amendments to Rule 74.23

Hi Danny,

Sorry for the delay in responding, but we did receive the draft rule and staff report you sent regarding Rule 74.23 and I did forward it to CARB staff for review.

Sincerely,
Stephanie



Stephanie Parent,
Air Pollution Specialist
Air Quality Planning and Science Division | South Coast Section

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The climate change challenge facing us is real. For a list of simple actions you can take to reduce your environmental impact, visit www.CoolCalifornia.org.

If you would like to give us feedback on our customer service, please complete the [customer satisfaction survey](#).

From: Danny McQuillan <danny@vcapcd.org>
Sent: Monday, September 23, 2019 1:11 PM
To: Fideldy, Ariel@ARB <ariel.fideldy@arb.ca.gov>; Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>; Doris Lo (lo.doris@epa.gov) <lo.doris@epa.gov>
Cc: Ali Ghasemi <aghasemi@vcapcd.org>
Subject: Ventura County APCD Updates to Proposed Amendments to Rule 74.23

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Greetings,

As per the conversation between ARB staff and VCAPCD on 9/20/19, VCAPCD has made a few minor revisions to our rule language which improves clarity, and provides an alternative emission limit for a unit which was determined to have a compliance cost which exceeds our cost-effectiveness threshold. VCAPCD will be proposing the updated version of amendments to Rule 74.23 to our Advisory Committee tomorrow (9/24/19), and to our Board for adoption on November 12, 2019. Changes are highlighted in the attached documents and are summarized as follows:

Rule Language

B.9.: Was added to provide an emission limit of 5 ppmv for one turbine located at New-Indy. This was due to new information demonstrating the estimated cost of compliance being between \$42,251 and \$118,874 per ton of NOx removed. Language was included for this provision to prevent any unintended turbines qualifying for this increased emission limit.

B.10.: Added language which improves enforceability.

Staff Report

On page 1 a clarification was made to include accurate numbers for the proposed higher emission limit for New-Indy's turbine.

On page 7 a paragraph was added justifying the inclusion of subsection B.9.

On page 8 there was a correction to the estimated emission reductions being actual reported and not a maximum potential and updated New-Indy turbine cost effectiveness values and estimated emission reductions.

On page 9 we updated turbine cost effectiveness values and estimated emission reductions.

On page 12 the proposed NOx limit was amended for the one turbine affected by subsection B.9. and corrected proposed NOx limits, proposed emissions and proposed reductions to reflect rule language.

Danny McQuillan

Air Quality Engineer – Rules Development and Incentives

Ventura County Air Pollution Control District

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